

STATE OF NEW JERSEY  
Office of the Attorney General  
Department of Law and Public Safety  
Division of Gaming Enforcement  
Petition No. 3341102

Petition of HARRAH'S ATLANTIC CITY )  
OPERATING COMPANY, LLC d/b/a )  
HARRAH'S RESORT ATLANTIC CITY; )  
SHOWBOAT ATLANTIC CITY OPERATING )  
COMPANY LLC, d/b/a SHOWBOAT CASINO )  
HOTEL; BALLY'S PARK PLACE INC. d/b/a )  
BALLY'S ATLANTIC CITY; and BOARDWALK )  
REGENCY CORP. d/b/a CAESARS )  
ATLANTIC CITY for a Declaratory Ruling )  
Regarding Certain Electronic Records )  
Management Systems )

ORDER

The Division of Gaming Enforcement is in receipt of Petition No. 3341102 filed by HARRAH'S ATLANTIC CITY OPERATING COMPANY, LLC d/b/a HARRAH'S RESORT ATLANTIC CITY; SHOWBOAT ATLANTIC CITY OPERATING COMPANY LLC, d/b/a SHOWBOAT CASINO HOTEL; BALLY'S PARK PLACE INC. d/b/a BALLY'S ATLANTIC CITY; and BOARDWALK REGENCY CORP. d/b/a CAESARS ATLANTIC CITY (hereinafter collectively "HARRAH'S") seeking a declaratory ruling permitting the use of its Document Approval and Routing and Tracking system ("DART") and Enterprise Records Management System ("ERM"); and,

Having reviewed the petition which states that DART is an electronic records system

that permits paperless tracking of invoices and other accounts payable information; and,

Having participated, on January 17, 2012, in a internet based seminar which provided information regarding the DART application; and,

Having reviewed the petition which states that ERM is a paperless management system that allows for the electronic storage of information, including casino, hotel and financial documents and reports; and,

Having participated, on January 31, 2012, in a internet based seminar which provided information regarding the ERM application; and,

Having conducted an on-site inspection of the data storage facility to assess the integrity of, and security of access to, the systems; and,

Having considered the relevant provisions of the Casino Control Act, *N.J.S.A. 5:12-1* et seq., and the regulations promulgated thereunder, specifically, *N.J.A.C. 13:69D-1:8*, wherein certain document retention standards are established; and,

Having considered the benefits to Harrah's in terms of increased efficiency in accessing, sorting, storing and evaluating its records in electronic form; and,

Having considered the benefits to the Division of Gaming Enforcement in terms of

increased efficiency in accessing, searching and evaluating Harrah's records for purposes of regulatory inspections and investigations in a paperless environment.

I HEREBY ORDER that the relief sought by Petitioner, HARRAH'S is GRANTED subject to the following conditions:

- 1) The DART and ERM systems shall be subject to a test period of 6 months during which time the Division may withdraw its approval if either system fails to satisfy regulatory requirements; and,
- 2) Harrah's shall retain a hard copy, if appropriate, of all documents scanned or entered into DART and ERM systems during the test period; and,
- 3) Harrah's shall establish written procedures to require that all documents are scanned or entered into the respective systems and no document, once scanned or entered into the DART or ERM system, shall be altered or deleted; and,
- 4) All documents scanned or entered into the respective systems shall be subject to the retention requirements of N.J.A.C. 13:69D-1:8; and,
- 5) Neither system application shall be altered, upgraded, or reconfigured without prior notice to and approval by the Division; and,
- 6) Harrah's shall identify an administrator for each system and provide contact information to the Division for the administrator.

Dated: February 21, 2012

By: David L. Rebeck

DAVID L. REBUCK  
Director